REMARKS

Reconsideration of the present Application is respectfully requested based on the following arguments and the claims as previously amended.

Rejections based on 35 U.S.C. § 102(e)

Claims 1, 5, and 9-18 are finally rejected under 35 U.S.C. 102(b) as being anticipated by Sullivan (US2003/0093320). Applicants respectively traverse this rejection.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." See MPEP 2131.

Sullivan does not disclose each feature of the claimed invention, specifically the address-geographic region (AGR) table and the geographic region-tax district (GRTD) table of each independent claim. Applicants respectively request that patentable weight be given to all of the features recited in applicants claims. We do not merely claim " an AGR table" nor merely "a GFTD table." Rather, what is recited includes:

> providing an address-geographical-region (AGR) table that associates said destination address with one or more geographic regions and said origination address with one or more geographic regions; and

> providing a geographic-region/tax-district (GRTD) table that associates said one or more geographic regions of said destination address with one or more tax districts and said one or more geographic regions of said origination address with one or more tax districts

To meet its burden under § 102, all of the claimed features must be found. The Office Action argues that the AGR tables of Sullivan's Address Manager teaches Applicant's AGR recitation. *See* Office Action p. 2, citing Sullivan's Fig. 1 and paragraph [0048]. But Sullivan's Address Manager as disclosed is not equivalent to Applicant's AGR. According to Sullivan's paragraph [0048], its Address Manager may "analyze the street address (street

number, street name, city name, state code or province name, and zip code) and assign at least one applicable tax location code associated with that address." But Sullivan does not disclose an address identifier or geographic identifier as claimed.

In Applicant's claimed invention, different addresses may have the same address identifier. This feature simplifies a tax lookup process. *See* Specification, p. 68, ll. 5-8. Thus, the Address Manager of the reference does not disclose Applicant's recited address identifier nor geographic identifier as claimed.

The Office Action also asserts that Applicant's recited GRTD tables are taught by Sullivan's configuration and transaction interfaces and tables (Sullivan's Figs. 3D-5B) and the Address Manager of Sullivan. *See* Office Action, pp.. 2-3. But Figs. 3D-3E are screen shots showing the selection by the merchant of taxing rules and product categories within a certain jurisdiction, e.g. within a state. It does not disclose assigning of tax districts to geographic regions by way of identifiers, because taxing may only be selected or deselected for certain municipalities. The remaining illustrations, Figs 4A-5B, show transaction tables that provide detailed information about each transaction <u>after it has been completed</u>. The referenced tables do not provide rules, but instead show the information of completed transactions.

Sullivan also does not disclose geographic identifiers. <u>Accordingly, it does not disclose GRTD tables.</u> Applicants describe how the inclusion of geographic identifiers can can be utilized for tax computation by allowing for overlap (school district or water district within city, multiple taxes in an area such as sales and rental taxes). *See* page 69, ll. 3-5. But Sullivan only allows for taxing to be implemented in a given "jurisdiction." The Specification also recites how changes to tax rules can be made easier by use of the geographic identifiers and the GRTD table.

Many other features are not taught in Sullivan because the aforementioned tables as claimed are not taught. For example, determining the geographic regions based on the AGR table, determining tax districts based on the GRTD table, comparing said one or more tax districts, identifying a set of geographic areas, determining a tax rate based on said set of identified geographic areas, computing associated the associated tax are all not disclosed in Sullivan at least because these features rely on the specific type of data structures claimed.

The dependent claims are allowable at least by virtue of their dependence from allowable base claims.

CONCLUSION

For at least the reasons stated above, claims 1, 5, and 9-18 are in condition for allowance. Applicants respectfully requests the timely passing of this application to issue. Should, however, any issues remain prior to issuance of this Application, the Examiner is urged to contact the undersigned – 816-559-2173 or jcamacho@shb.com (such communication via email is herein expressly granted) – to resolve the same. It is believed that no fee is due, however, the Commissioner is hereby authorized to charge any amount required to Deposit Account No. 21-0765.

Respectfully submitted,

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